

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re: : Chapter 9  
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CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
:  
Debtor. : Hon. Steven W. Rhodes  
:  
:  
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**STIPULATION FOR ENTRY OF AN ORDER REGARDING EXHIBITS  
ADMITTED INTO EVIDENCE**

On November 8, 2013, during a recess on the final day of the trial regarding the July 18, 2013 Eligibility Motion of the City of Detroit, Michigan (the “City”), the Court provided counsel with a list of trial exhibits that had been admitted into evidence over the course of the 9-day hearing. The list was intended to supplement the exhibits that had already been admitted into evidence by way of the Court’s October 24, 2013 Pre-Trial Order regarding exhibits to which there had been no pre-trial objections. Counsel to the City and counsel to Objectors indicated in court that there were no objections to the supplemental list of exhibits that was provided by the Court but did not make that supplemental list part of the formal record. This stipulation is intended to formalize that understanding.

The supplemental list of admitted exhibits has been reformatted and is enclosed with this stipulation as Exhibit A. The parties, (a) Movant the City of Detroit and (b) Objectors (i) Shirley V. Lightsey, President of the Detroit Retired City Employees Association (the “DRCEA”), (ii) Don Taylor, President of the Retired Detroit Police and Firefighters Association (the “RDPFFA”), (iii) the DRCEA, (iv) the RDPFFA, (v) the Official Committee of Retirees (the “Committee”), (vi) the Michigan Council 25 of the American Federation of State, County and Municipal Employees (“AFSCME”), (vii) the UAW, (viii) the General Retirement System of the City of Detroit, (ix) the Police and Fire Retirement System of the City of Detroit, (x) the Detroit Public Safety Unions; and (xi) the Retired Detroit Police Members Association (collectively, “Objectors” to the City’s July 18, 2013 Eligibility Motion), have now conferred and hereby stipulate that the exhibits listed and attached hereto as Exhibit A were admitted into evidence at the hearing on the City’s Eligibility Motion.

The parties also believe that an additional exhibit, Exhibit 840, was admitted into evidence in part but was not included in the supplemental list from the Court. The parties stipulate that Exhibit 840 was admitted into the record in accordance with the limitations imposed by the Court at the time, which speak for themselves, but appear in the November 7, 2013 Unofficial Transcript (which is all that is available to the parties at the moment) at page 33, line 8 through page 34, line 6.

The parties enter this stipulation without prejudice to any party's rights to seek the entry of other exhibits into the record.

Dated: November 22, 2013

Respectfully submitted,

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General Retirement System of the City of  
Detroit*

## **Exhibit A**

Exhibits admitted in addition to those listed in October 24, 2013 Pre-trial Order:

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75<sup>1</sup>  
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<sup>1</sup> Exhibit 75 was also admitted in the Pre-trial Order.

### **SUMMARY OF ATTACHMENTS**

The following documents are attached to this Stipulation, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	None [Notice Not Required]
Exhibit 3	None [Brief Not Required]
Exhibit 4	Certificate of Service [To Be Separately Filed]

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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	:	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
-----X		

**SUPPLEMENTAL ORDER ON EXHIBITS**

Having been advised in the premises and having considered the parties' Stipulation for Entry of an Order Regarding Exhibits Admitted Into Evidence ("Stipulation"), the Court hereby GRANTS the Stipulation and enters the following Order:

1. In addition to those exhibits admitted by way of this Court's October 24, 2013 Pre-trial Order, the Court enters the following exhibits into the record for the evidentiary hearing conducted from October 23, 2013 through November 8, 2013 on the City's Eligibility Motion, subject only to any limitations on use or admissibility imposed by the Court at the time of admission: Exhibit Nos. 9

through 11, 32, 38, 41, 69, 70, 75,<sup>2</sup> 105, 201, 202, 438, 458, 460, 505, 588, 615, 616, 619, 620, 624 through 626, 706, 707, 717 through 719, 836, 840, 841, 846, 853, 870, and 872.

Accordingly, the above-listed exhibits are admitted into evidence for the purposes of the trial regarding the July 18, 2013 Eligibility Motion of the City of Detroit, Michigan.

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<sup>2</sup> Exhibit 75 was also admitted in the Pre-trial Order.

**EXHIBIT 2**

***None [Notice of Motion and Opportunity to Object Not Required]***

**EXHIBIT 3**

***None [Brief Not Required]***

**EXHIBIT 4**

*Certificate of Service [To Be Separately Filed]*